

## **REMARKS**

All the claims submitted for examination in this application have been objected to and/or rejected. Applicant has amended his claims and respectfully submits that all of the claims currently in this application are patentable over the objections and rejections of record.

Turning to the objection of record, Claims 2, 13, 16, 19 and 20 stand objected to, under 37 C.F.R. §1.75(c), for failure to further limit the subject matter of a previous claim. Claims 2, 13, 16, 19 and 20 have been canceled. As such, the objection of record is moot.

Two substantive grounds of rejection have been imposed in the outstanding Official Action. The first of these is directed to Claims 1, 2, 5, 6, 8-13 and 16-20. These claims stand rejected, under 35 U.S.C. §102(e), as being anticipated by U.S. Patent 6,140,025 to Imai et al.

The Official Action argues that Example 5 of Imai et al. describes a process in which 3 parts of acetic acid are added to 100 parts of a photosensitive solution, which is obtained by the addition reaction of acrylic acid and a copolymer of methyl acrylate/styrene/butyl acrylate/glycidyl methacrylate/dimethylaminoethyl methacrylate, 0.5 part of photosensitizer, 55 parts of trimethylolpropane triacrylate and 20 parts of a titanocene compound. This yields 1.2 parts of an acetic acid per 40 parts of the photocurable resin.

The current amendment to independent Claims 1, 12 and 18 has deleted acetic acid, propionic acid, lactic acid and formic acid from the Markush group of organic acids. The relied upon portion of Imai et al., as indicated above, relies on the disclosure of

acetic acid. Thus, the deletion of acetic acid from the organic acids within the contemplation of the independent claims of the present application, from which all the remaining claims ultimately depend, removes the possibility that Imai et al. anticipates any of the claims of the present application.

It is furthermore noted that Imai et al., at Column 10, lines 17-23, discloses an aqueous dispersion or solution of an aqueous photosensitive resin composition that is formed by neutralizing the aqueous photosensitive resin composition with an alkali by introducing an anionic group, such as a carboxyl group, into the photosensitive resin composition or neutralizing it with an acid when a cationic group, such as an amino group, is introduced therein. Imai et al., at Column 10, lines 27-31, further discloses that the acid neutralizer may be acetic acid, propionic acid, lactic acid, hydrochloric acid, sulfuric acid, phosphoric acid, formic acid and crotonic acid.

Of the acids mentioned at Column 10, lines 27-31 of Imai et al., three of them, propionic acid, lactic acid and formic acid, in addition to acetic acid, are recited in some or all of independent Claims 1, 12 and 18. These acids have additionally been deleted from independent Claims 1, 12 and 18.

The above remarks establish that any potential anticipatory effect of the applied Imai et al. reference is overcome by the aforementioned amendments to the independent claims of the present application. Therefore, it is apparent that all of the claims currently in this application are patentable, under 35 U.S.C. §102(e), over Imai et al.

Although the claims of the present application have not been rejected under 35 U.S.C. §103(a) as being obvious over Imai et al., applicant, in a surfeit of caution,

emphasizes the patentable nature of the claims currently in this application over this ground of rejection.

The above remarks establish that Imai et al. utilizes the specific acids mentioned above as a neutralizer when a cationic group, such as an amino group, is introduced into the photosensitive resin composition. Thus, the use of an acid is optional depending upon the method utilized in Imai et al. to prepare the photosensitive resin composition.

It is merely coincidental that acids are utilized in the Imai et al. disclosure. The claims of the present application, directed to a photoresist composition, a method of improving removal of a photoresist composition from a substrate and a method of manufacturing a printed wiring board utilize the recited Markush group of organic acids in an entirely different manner, e.g. imparting improved stripability or removability to photoresist compositions. No such teaching is provided by Imai et al. Moreover, this property is not inherently disclosed by Imai et al. insofar as it is an optional component that is not so much as present in the event that the aqueous photosensitive resin composition of Imai et al. employs an anionic group. Thus, it cannot be said that the Imai et al. composition inherently discloses the invention of the present application.

The second substantive ground of rejection is directed to Claim 7. Claim 7 stands rejected, under 35 U.S.C. §103(a), as being unpatenable over Imai et al.

Claim 7 is directed to a Markush group of 43 photoactive components. Yet none of them is mentioned in the applied Imai et al. reference. To overcome the resultant presumption of patentability, the Official Action relies on the laundry list of light radical polymerization initiators set forth in Imai et al. at Column 6, lines 40-Column 7, line 9.

Amongst those initiators are titanate compounds and benzophenone. Thus, the Official Action argues the initiators of Claim 7 are equivalent to those disclosed in Imai et al.

Even if the indirect Imai et al. disclosure makes obvious the limitation of Claim 7, which applicant strongly denies, still the above remarks, which establish patentability of Claim 1, from which Claim 7 depends, establishes the patentability of Claim 7.

Admission of the present amendment into the application after final rejection is deemed proper insofar as the amendment reduces the issues on appeal and better places this application in condition for allowance. Introduction into the application of the present amendment is therefore deemed appropriate. Such action is respectfully urged.

The above amendment and remarks establish the patentable nature of all the claims currently in this application. Notice of Allowance and passage to issue of these claims, Claims 1, 6-12, 17 and 18, is therefore respectfully solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Marvin Bressler", with a long horizontal flourish extending to the right.

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